

# Exhibit A

## State Court Case Pleadings

**COMPLETED**

**USPS CERTIFIED MAIL™**

Route  
Deliver To  
(Floor / Room)  
**Kiella, Melody**  
Sender  
**Unknown**

**INB0073154**

**Signature Required**

Jaraysi Law, LLC  
66 LENOX POINTE NE  
ATLANTA GA 30324-3170

**USPS CERTIFIED MAIL**



**9414 8118 9876 5856 3740 57**

DREW ECKL & FARNHAM, LLP  
Melody Kiella, Esq. and Jack Summer, Esq.  
303 PEACHTREE ST NE STE 3500  
ATLANTA GA 30308-3263



**\$6.53 US POSTAGE**

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Oct 26 2021

Mailed from ZIP 30324

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11923275



062S0012913542



IN THE STATE COURT OF DEKALB COUNTY  
STATE OF GEORGIA

BLANCA MEJIA

Plaintiff,

v.

GEORGI BOYKOV,  
FOXTRAN, INC.,

Defendants.

CIVIL ACTION FILE # 21A04842

JURY TRIAL DEMANDED

---

PLAINTIFF'S NOTICE OF LAWSUIT, NOTICE OF DUTY TO AVOID UNNECESSARY  
COSTS OF SERVICE OF SUMMONS & REQUEST FOR WAIVER OF SERVICE OF  
SUMMONS TO DEFENDANTS, GEORGI BOYKOV & FOXTRAN, INC.

---

SENT VIA CERTIFIED MAIL  
RETURN RECEIPT REQUESTED  
[9414811898765856374057]

TO : GEORGI BOYKOV & FOXTRAN, INC.  
c/o Melody Kiella, Esq. and Jack Summer, Esq.  
303 Peachtree Street, NE, Suite 3500  
Atlanta, Georgia 30308  
COPY SENT VIA E-MAIL: KiellaM@deflaw.com; SummerJ@deflaw.com

**NOTICE OF LAWSUIT**

A Complaint for Damages – otherwise known as a “lawsuit” – has been filed against you in DeKalb County State Court, Georgia and has been assigned Case Number 21A04842.

**NOTICE OF DUTY TO AVOID UNNECESSARY COSTS OF SERVICE OF SUMMONS**

Certain parties are required to cooperate in saving unnecessary costs of service of the summons and the pleading under O.C.G.A. § 9-11-4(d).

A Defendant located in the United States who, after being notified of a case and asked by a Plaintiff located in the United States to waive service of a Summons, fails to do waive service will be required to bear the cost of such service unless good cause be shown for such Defendant's failure to sign and return the waiver.

It is not good cause for a failure to waive service that a party believes that the Complaint is unfounded, or that the case has been brought in an improper place or in a court that lacks jurisdiction over the subject-matter of the case or over its person or property.

A party who waives service of the Summons retains all defenses and objections [except any relating to the Summons or to the service of the Summons] and may later object to the jurisdiction of the Court or to the place where the case has been brought.

A Defendant who waives service must, within the time specified on the waiver form, serve on the Plaintiff's attorney a response to the Complaint and also must file a signed copy of the response with the court.

If the Answer is not served within this time, a Default Judgment may be taken against that Defendant.

By waiving service, a Defendant is allowed more time to Answer than if the Summons had been actually served when the request for waiver of service was received.

**REQUEST FOR WAIVER OR ACKNOWLEDGEMENT OF SERVICE OF SUMMONS**

This is not a formal Summons or notification from the Court. It is our request, under O.C.G.A. § 9-11-4, that you sign and return the enclosed *Waiver of Service* in order to save the cost of serving you with a judicial Summons and an additional copy of the Complaint.

The cost of service will be avoided if we receive a signed copy of the *Waiver of Service* within thirty [30] days after the date designated below, as the date on which this *Notice of Lawsuit and Request for Waiver of Service of Summons* is sent.

**YOU ARE ENTITLED TO CONSULT WITH YOUR ATTORNEY ABOUT THIS.**

If you comply with this request and return the signed *Waiver of Service*, it will be filed with the Court and no summons will be served on you.

The case will then proceed as if you had been served on the date the *Waiver of Service* is filed except that you will not be obligated to answer or otherwise respond to Plaintiff's Complaint within sixty [60] days from the date designated below as the date on which this notice is sent.

If you do not return the signed *Waiver of Service* within the time indicated, we will take appropriate steps to effect formal service in a manner authorized by the Georgia Rules of Civil Procedure and then, to the extent authorized by those rules, we will ask the Court to require you [or the party on whose behalf you are addressed] to pay the full cost of such service.

In that regard, please read the statement concerning the duty of parties to avoid unnecessary costs of service of summons, which is set forth on the *Notice of Duty to Avoid Unnecessary Costs of Service of Summons* enclosed herein.

We affirm that this *Notice of Lawsuit and Request for Waiver of Service of Summons* is being sent to you on behalf of the Plaintiff on this 26<sup>th</sup> day of October, 2021.

**THIS 26TH DAY OF OCTOBER, 2021.**

**RESPECTFULLY SUBMITTED,**



**JARAYSI LAW, LLC**  
66 Lenox Pointe NE  
Atlanta, GA 30324  
Fax: 888-576-7869

---

**PETER JARAYSI, ESQ.**  
Georgia Bar # 297725  
Direct Dial: 404-951-3513  
E-Mail: peter@jaraysilawfirm.com

*Attorney for the Plaintiff*

IN THE STATE COURT OF DEKALB COUNTY  
STATE OF GEORGIA

**BLANCA MEJIA**

**Plaintiff,**

**v.**

**GEORGI BOYKOV,  
FOXTRAN, INC.**

**Defendants.**

**CIVIL ACTION FILE # 21A04842**

**JURY TRIAL DEMANDED**

---

**WAIVER OF SERVICE OF SUMMONS BY DEFENDANT, GEORGI BOYKOV**

---

**TO : JARAYSI LAW, LLC**  
ATTN: Peter Jaraysi, Esq.  
66 Lenox Pointe NE  
Atlanta, GA 30324

I acknowledge receipt of your request that I waive service of a Summons in the case of Blanca Mejia v. Georgi Boykov and Foxtran, Inc., which is case number 21A04842 in DeKalb County State Court, Georgia.

I have also received a copy of the Complaint in the case, two copies of this instrument, and a means by which I can return the signed waiver to you without cost to me.

I understand that I am entitled to consult with my own attorney regarding the consequences of my signing this waiver.

I agree to save the cost of service of a Summons and an additional copy of the Complaint in this lawsuit by not requiring that I be served with judicial process in the manner provided by the Georgia Rules of Civil Procedure.



I will retain all defenses or objections to the lawsuit or to the Jurisdiction or Venue of the Court except for objections based on a defect in the Summons or in the service of the Summons.

I understand that a judgment may be entered against me if an Answer is not served upon you within sixty [60] days after the date this waiver was sent.

THIS \_\_\_\_ DAY OF \_\_\_\_\_, 2021.

\_\_\_\_\_  
Defendant, Georgi Boykov

\_\_\_\_\_  
Georgia Bar No.: \_\_\_\_\_  
*Attorney for Defendant, Georgi Boykov*

Sworn to and subscribed before me this \_\_\_\_ day of \_\_\_\_\_, 2021.

NOTARY PUBLIC \_\_\_\_\_ County, State of \_\_\_\_\_.

\_\_\_\_\_  
My Commission Expires:

IN THE STATE COURT OF DEKALB COUNTY  
STATE OF GEORGIA

**BLANCA MEJIA**

**Plaintiff,**

**v.**

**GEORGI BOYKOV,  
FOXTRAN, INC.**

**Defendants.**

**CIVIL ACTION FILE # 21A04842**

**JURY TRIAL DEMANDED**

---

**WAIVER OF SERVICE OF SUMMONS BY DEFENDANT, FOXTRAN, INC.**

---

**TO : JARAYSI LAW, LLC**  
ATTN: Peter Jaraysi, Esq.  
66 Lenox Pointe NE  
Atlanta, GA 30324

I acknowledge receipt of your request that I waive service of a Summons in the case of Blanca Mejia v. Georgi Boykov and Foxtran, Inc., which is case number 21A04842 in DeKalb County State Court, Georgia.

I have also received a copy of the Complaint in the case, two copies of this instrument, and a means by which I can return the signed waiver to you without cost to me.

I understand that I am entitled to consult with my own attorney regarding the consequences of my signing this waiver.

I agree to save the cost of service of a Summons and an additional copy of the Complaint in this lawsuit by not requiring that I be served with judicial process in the manner provided by the Georgia Rules of Civil Procedure.

I will retain all defenses or objections to the lawsuit or to the Jurisdiction or Venue of the Court except for objections based on a defect in the Summons or in the service of the Summons.

I understand that a judgment may be entered against me if an Answer is not served upon you within sixty [60] days after the date this waiver was sent.

**THIS \_\_\_\_ DAY OF \_\_\_\_\_, 2021.**

\_\_\_\_\_  
**Defendant, Foxtran, Inc.**

\_\_\_\_\_  
Georgia Bar No.: \_\_\_\_\_  
*Attorney for Defendant, Foxtran, Inc.*

**Sworn to and subscribed before me this \_\_\_\_ day of \_\_\_\_\_, 2021.**

**NOTARY PUBLIC \_\_\_\_\_ County, State of \_\_\_\_\_.**

\_\_\_\_\_  
**My Commission Expires:**

IN THE STATE COURT OF DEKALB COUNTY  
STATE OF GEORGIA

BLANCA MEJIA

Plaintiff,

v.

GEORGI BOYKOV,  
FOXTRAN, INC.

Defendants.

CIVIL ACTION FILE # 21A04842

JURY TRIAL DEMANDED

ACKNOWLEDGEMENT OF SERVICE BY DEFENDANT, GEORGI BOYKOV

The undersigned is the attorney for GEORGI BOYKOV, a Defendant in the above-styled case. The undersigned states that at the specific instance and request of GEORGI BOYKOV, they are authorized and directed to acknowledge personal service of the subject Summons and Complaint. The undersigned further states that they are in possession of a service copy of the Summons and Complaint for GEORGI BOYKOV, and therefore waives all other and further service of process or objection to the adequacy of the same.

THIS \_\_\_\_ DAY OF \_\_\_\_\_, 2021.

Sworn to and subscribed before me this  
\_\_\_\_ day of \_\_\_\_\_, 2021.

\_\_\_\_\_  
Georgia Bar No.: \_\_\_\_\_  
Attorney for Defendant, Georgi Boykov

NOTARY PUBLIC \_\_\_\_\_ County,  
State of \_\_\_\_\_.

\_\_\_\_\_  
My Commission Expires:



IN THE STATE COURT OF DEKALB COUNTY  
STATE OF GEORGIA

BLANCA MEJIA

Plaintiff,

v.

GEORGI BOYKOV,  
FOXTRAN, INC.

Defendants.

CIVIL ACTION FILE # 21A04842

JURY TRIAL DEMANDED

ACKNOWLEDGEMENT OF SERVICE BY DEFENDANT, FOXTRAN, INC.

The undersigned is the attorney for FOXTRAN, INC., a Defendant in the above-styled case. The undersigned states that at the specific instance and request of FOXTRAN, INC., they are authorized and directed to acknowledge personal service of the subject Summons and Complaint. The undersigned further states that they are in possession of a service copy of the Summons and Complaint for FOXTRAN, INC., and therefore waives all other and further service of process or objection to the adequacy of the same.

THIS \_\_\_\_ DAY OF \_\_\_\_\_, 2021.

Sworn to and subscribed before me this  
\_\_\_\_ day of \_\_\_\_\_, 2021.

\_\_\_\_\_  
Georgia Bar No.: \_\_\_\_\_  
Attorney for Defendant, Foxtran, Inc.

NOTARY PUBLIC \_\_\_\_\_ County,  
State of \_\_\_\_\_.

\_\_\_\_\_  
My Commission Expires:

IN THE STATE COURT OF DEKALB COUNTY  
STATE OF GEORGIA

BLANCA MEJIA

Plaintiff,

v.

GEORGI BOYKOV,  
FOXTRAN, INC.

Defendants.

CIVIL ACTION FILE # 21A04842

JURY TRIAL DEMANDED

---

CERTIFICATE OF SERVICE

---

This certifies that I have served ***PLAINTIFF'S NOTICE OF LAWSUIT, NOTICE OF DUTY TO AVOID UNNECESSARY COSTS OF SERVICE OF SUMMONS & REQUEST FOR WAIVER OF SERVICE OF SUMMONS TO DEFENDANTS GEORGI BOYKOV & FOXTRAN, INC.*** on Defendants by serving it via

Certified Mail, Return Receipt Requested [Receipt # **9414811898765856374057**] to:

**GEORGI BOYKOV & FOXTRAN, INC.**  
c/o Melody Kiella, Esq. and Jack Summer, Esq.  
[KiellaM@deflaw.com; SummerJ@deflaw.com]  
303 Peachtree Street, NE, Suite 3500  
Atlanta, Georgia 30308

[SIGNATURE PAGE FOLLOWS]

**THIS 26TH DAY OF OCTOBER, 2021.**

**RESPECTFULLY SUBMITTED,**



---

**PETER JARAYSI, ESQ.**

Georgia Bar # 297725

Direct Dial: 404-951-3513

E-Mail: [peter@jaraysilawfirm.com](mailto:peter@jaraysilawfirm.com)

*Attorney for the Plaintiff*

**JARAYSI LAW, LLC**  
66 Lenox Pointe NE  
Atlanta, GA 30324  
Fax: 888-576-7869

No. 21A04842**STATE COURT OF DEKALB COUNTY  
GEORGIA, DEKALB COUNTY**

Date Summons Issued and E-Filed

10/26/2021**SUMMONS**/s/ Monica Gay

Deputy Clerk

Deposit Paid \$ \_\_\_\_\_

BLANCA MEJIA

Plaintiff's name and address

**vs.**FOXTRAN, INC. C/O CODY B. GILLIES5704 Veterans Pkwy. Columbus, GA 31904

Defendant's name and address

☒ **JURY****TO THE ABOVE-NAMED DEFENDANT:**

You are hereby summoned and required to file with the Clerk of State Court, Suite 230, 2<sup>nd</sup> Floor, Administrative Tower, DeKalb County Courthouse, 556 N. McDonough Street, Decatur, Georgia 30030 and serve upon the plaintiff's attorney, to wit:

PETER JARAYSI, ESQ.

Name

66 LENOX POINTE NE, ATLANTA, GA 30324

Address

4049513513297725

Phone Number

Georgia Bar No.

an **ANSWER** to the complaint which is herewith served upon you, within thirty (30) days after service upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. The answer or other responsive pleading can be filed via electronic filing through eFileGA via [www.eFileGA.com](http://www.eFileGA.com) or, if desired, at the e-filing public access terminal in the Clerk's Office at 556 N. McDonough Street, Decatur, Georgia 30030

Defendant's Attorney

Third Party Attorney

Address

Address

Phone No.

Georgia Bar No.

Phone No.

Georgia Bar No.

**TYPE OF SUIT**

- ☒ Personal Injury ☐ Products Liability  
☐ Contract ☐ Medical Malpractice  
☐ Legal Malpractice ☐ Product Liability  
☐ Other

Principal \$ \_\_\_\_\_

Interest \$ \_\_\_\_\_

Atty Fees \$ \_\_\_\_\_

Access to the e-filing site and the rules is available at [www.dekalbstatecourt.net](http://www.dekalbstatecourt.net)

To indicate consent to e-service check the box below.

☒ (Plaintiff consents to e-service pursuant to OCGA 9-11-5 (f). The email address for service appears in the complaint.

E-file summons1-2016

STATE COURT OF  
DEKALB COUNTY, GA.  
10/25/2021 5:29 PM  
E-FILED  
BY: Monica Gay



No. 21A04842**STATE COURT OF DEKALB COUNTY  
GEORGIA, DEKALB COUNTY****Date Summons Issued and E-Filed**10/26/2021**SUMMONS**/s/ Monica Gay

Deputy Clerk

Deposit Paid \$ \_\_\_\_\_

BLANCA MEJIA\_\_\_\_\_  
Plaintiff's name and address**vs.**GEORGI BOYKOV C/O GEORGIA SECRETARY OF STATE2 Martin Luther King, Jr. Dr. SE, Suite 313, Floyd West Tower, Atlanta, GA 30334\_\_\_\_\_  
Defendant's name and address☒ **JURY****TO THE ABOVE-NAMED DEFENDANT:**

You are hereby summoned and required to file with the Clerk of State Court, Suite 230, 2<sup>nd</sup> Floor, Administrative Tower, DeKalb County Courthouse, 556 N. McDonough Street, Decatur, Georgia 30030 and serve upon the plaintiff's attorney, to wit:

PETER JARAYSI, ESQ.

Name

66 LENOX POINTE NE, ATLANTA, GA 30324

Address

4049513513297725

Phone Number

Georgia Bar No. \_\_\_\_\_

an **ANSWER** to the complaint which is herewith served upon you, within thirty (30) days after service upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. The answer or other responsive pleading can be filed via electronic filing through eFileGA via [www.eFileGA.com](http://www.eFileGA.com) or, if desired, at the e-filing public access terminal in the Clerk's Office at 556 N. McDonough Street, Decatur, Georgia 30030

\_\_\_\_\_  
Defendant's Attorney\_\_\_\_\_  
Third Party Attorney

Address

Address

Phone No.

Georgia Bar No.

Phone No.

Georgia Bar No.

**TYPE OF SUIT**

- ☒ Personal Injury ☐ Products Liability  
☐ Contract ☐ Medical Malpractice  
☐ Legal Malpractice ☐ Product Liability  
☐ Other

Principal \$ \_\_\_\_\_

Interest \$ \_\_\_\_\_

Atty Fees \$ \_\_\_\_\_

**Access to the e-filing site and the rules is available at [www.dekalbstatecourt.net](http://www.dekalbstatecourt.net)****To indicate consent to e-service check the box below.**

☒ (Plaintiff consents to e-service pursuant to OCGA 9-11-5 (f). The email address for service appears in the complaint.

E-file summons1-2016

STATE COURT OF  
DEKALB COUNTY, GA.  
10/25/2021 5:29 PM  
E-FILED  
BY: Monica Gay

IN THE STATE COURT OF DEKALB COUNTY  
STATE OF GEORGIA

BLANCA MEJIA,

Plaintiff,

vs.

GEORGI BOYKOV,  
FOXTRAN, INC.,

Defendants.

Civil Action File No. 21A04842

JURY TRIAL DEMANDED

---

PLAINTIFF'S RENEWED COMPLAINT FOR DAMAGES & JURY DEMAND

---

**COMES NOW**, Blanca Mejia (hereinafter referred to as, "Plaintiff"), by and through the undersigned counsel, pursuant to O.C.G.A. § 9-2-61, and files this *Plaintiff's Renewed Complaint for Damages & Jury Demand*, complaining of the acts and omissions of Georgi Boykov, and Foxtran, Inc. (hereinafter collectively referred to as, "Defendants") as follows:

**I. VALIDITY OF PRIOR ACTION AND TIMELY RENEWAL**

**1.**

Plaintiff's cause of action arises out of a motor vehicle versus tractor-trailer collision on November 9, 2019, caused by the negligent operation of a vehicle driven by Georgi Boykov while acting in the regular course and scope of his agency or employment with Foxtran, Inc., resulting in serious injuries to Plaintiff.

**2.**

Plaintiff filed her initial complaint for Plaintiff's injuries against Georgi Boykov and Foxtran, Inc. on May 24, 2021 in DeKalb County State Court [case # 21A02508] [hereinafter referred to as "Plaintiff's 1<sup>st</sup> Complaint"] and properly served all Defendants.

3.

Plaintiff voluntarily dismissed Plaintiff's 1<sup>st</sup> Complaint without prejudice on October 1, 2021.

**II. JURISDICTION & VENUE**

4.

Plaintiff is an adult Georgia resident and voluntarily subjects herself to the Jurisdiction and Venue of this Honorable Court by filing this action.

5.

Georgi Boykov (hereinafter referred to as "Defendant Boykov") is, upon information and belief, subject to the Jurisdiction and Venue of this Honorable Court, was a nonresident motorist at the time of the motor vehicle collision that is the subject of this lawsuit and may be served with a copy of the Summons and Complaint via the Georgia Secretary of State, pursuant to O.C.G.A. § 40-12-2 and via certified mail to his last known address at 1304 S. Sir Lancelot Ln., Apartment 2B, Mount Prospect, IL 60056.

6.

Foxtran, Inc. (hereinafter referred to as, "Defendant Foxtran"), a foreign corporation conducting interstate commerce, has a principal office located at 225 N. Arlington Heights Road, Suite # 204, Elk Grove Village, IL 60057, is subject to the jurisdiction of this Court, and may be served through its registered agent, Cody B. Gillies, at 5704 Veterans Pkwy., Columbus, GA 31904.

**7.**

The motor vehicle collision that is the subject of this lawsuit occurred at the entrance ramp to Interstate 85 northbound from Interstate 285 westbound, which is located in DeKalb County, Georgia.

**8.**

Jurisdiction and Venue in the State Court of DeKalb County, Georgia is proper for the above and following reasons.

**III. FACTS**

**9.**

At approximately 6:00 P.M. on November 9, 2019, Defendant Boykov drove a 2016 Freightliner TR (VIN: 3AKJGLD57GSGT7371) (IL Tag # PTE8709) tractor, towing a trailer (IL Tag # 619873) (hereinafter referred to as “Defendant Foxtran’s vehicle”) on the two-lane entrance ramp from Interstate 285 westbound to Interstate 85 northbound in the right lane.

**10.**

At all times relevant hereto, Defendant Boykov drove within the course and scope of his employment with Defendant Foxtran.

**11.**

At the same time and place, Julio Madrid drove a 2014 Toyota Tundra (VIN: 5TFEY5F11EX155568) (GA Tag # PTE8709) (hereinafter referred to as “Julio Madrid’s vehicle”) on the two-lane entrance ramp from Interstate 285 westbound to Interstate 85 northbound in the left lane.



12.

At all times relevant hereto, Plaintiff was a passenger in Julio Madrid's vehicle.

13.

Defendant Boykov failed to illuminate his turn signal before the two-lane entrance ramp merged into one lane.

14.

Soon after the lanes merged, Defendant Boykov collided into the passenger-rear side of Julio Madrid's vehicle.

15.

As a result of this wreck, Plaintiff suffered painful physical injuries and required subsequent medical treatment thereafter.

**IV. NEGLIGENCE & NEGLIGENCE PER SE AGAINST DEFENDANT BOYKOV AND/OR DEFENDANT FOXTRAN**

16.

Plaintiff incorporates all previous allegations contained in paragraphs 1-15 of this Complaint as if set forth verbatim herein.

17.

At all times relevant to this incident, Defendant Boykov owed a duty to Plaintiff to operate Defendant Foxtran's vehicle in a lawful, careful and prudent manner, in accordance with the Georgia Uniform Rules of the Road, the Code of Federal Regulations, and the common laws of this State, pertaining to the operation of a commercial motor vehicle upon the public street.

**18.**

However, Defendant Boykov breached those aforesaid duties owed to Plaintiff, negligently violated Georgia law, and negligently:

- [a]** Failed to operate a motor vehicle with ordinary diligence which is exercised by ordinarily prudent persons under the same or similar circumstances, in violation of O.C.G.A. § 51-1-2, which constitutes *negligence per se*;
- [b]** Failed to properly change lanes, in violation of O.C.G.A. § 40-6-48, which constitutes *negligence per se*;
- [c]** Failed to properly signal intention to change lanes for a sufficient time, in violation of O.C.G.A. § 40-6-123, which constitutes *negligence per se*;
- [d]** Drove a motor vehicle at a greater speed than reasonable and prudent under the conditions and disregarding the actual and potential hazards then existing, in violation of O.C.G.A. § 40-6-180, which constitutes *negligence per se*;
- [e]** Failed to avoid distractions and maintain a proper lookout while driving a motor vehicle, in violation of O.C.G.A. § 40-6-241, which constitutes *negligence per se*;
- [f]** Failed to use the motor vehicle's horn to warn of the perilous situation when it was reasonably necessary to do so, in violation of O.C.G.A. § 40-8-70, which constitutes *negligence per se*;
- [g]** Failed to avoid or mitigate this collision;
- [h]** Failed to drive a motor vehicle in a safe and prudent manner.

**19.**

Defendant Boykov further committed additional negligent acts and omissions to be proven by the facts and evidence at trial.

**20.**

At all times relevant hereto, Defendant Boykov was acting within the scope of employment for Defendant Foxtran.

21.

Under *respondeat superior*, Defendant Foxtran is responsible for the negligent acts and/or omissions of Defendant Boykov.

22.

Before this collision, Defendant Foxtran knew or should have known that Defendant Boykov was not fit to drive Defendant Foxtran's vehicle such that Defendant Foxtran negligently retained Defendant Boykov.

23.

Defendant Foxtran negligently hired Defendant Boykov after it had actual knowledge that Defendant Boykov was not fit to drive Defendant Foxtran's vehicle.

24.

Defendant Foxtran failed to appropriately train Defendant Boykov to drive Defendant Foxtran's vehicle such that Defendant Foxtran negligently trained Defendant Boykov.

25.

Defendant Foxtran failed to appropriately supervise Defendant Boykov while he drove Defendant Foxtran's vehicle such that Defendant Foxtran negligently supervised Defendant Boykov.

26.

Plaintiff sustained painful physical injuries and damages as a direct and proximate result of Defendant Boykov's breach of aforementioned legal duties owed to the Plaintiff.

**V. GENERAL & SPECIAL DAMAGES UNDER O.C.G.A. § 51-12-2**

**27.**

Plaintiff incorporates all previous allegations contained in paragraphs 1-26 of this Complaint as if set forth verbatim herein.

**28.**

As a direct and proximate result of Defendants' negligence, as stated hereinabove, Plaintiff suffered painful injuries.

**29.**

As a direct and proximate result of Defendants' negligence, as stated hereinabove, Plaintiff suffered conscious physical pain and suffering.

**30.**

As a direct and proximate result of Defendants' negligence, as stated hereinabove, Plaintiff suffered conscious mental pain and suffering.

**31.**

As a direct and proximate result of Defendants' negligence, as stated hereinabove, Plaintiff incurred reasonable and necessary medical expenses of no-less-than \$37,000.00 due to the nature and extent of Plaintiff's injuries.

**32.**

By reason of the foregoing, Plaintiff is entitled to recover compensatory damages from Defendants for past, present, and future emotional and physical pain and suffering, disability, and loss of quality of life in such an amount as shall be shown by the evidence and determined by the enlightened conscience of the jury.



33.

By reason of the foregoing, Plaintiff is entitled to recover special damages from Defendants for past and future medical expenses, in such an amount as shall be shown by the evidence and proven at trial.

**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff respectfully requests this Honorable Court for the following:

- [a]** That Summons issue and service be perfected upon Defendants requiring them to appear in this Honorable Court within the time prescribed by Georgia law and answer this Complaint;
- [b]** Judgment for Plaintiff against Defendants for past, present and future pain and suffering;
- [c]** Judgment for Plaintiff against Defendants for past, present and future treatment expenses;
- [d]** Trial by jury of twelve (12) jurors under O.C.G.A. § 15-12-122(a)(2); and
- [e]** Any other relief this Court deems fair and just.

**THIS 25TH DAY OF OCTOBER, 2021.**

**RESPECTFULLY SUBMITTED,**



---

**PETER JARAYSI, ESQ.**

Georgia Bar # 297725

Direct Dial: 404-951-3513

E-Mail: peter@jaraysilawfirm.com

*Attorney for the Plaintiff*

**JARAYSI LAW, LLC**

66 Lenox Pointe NE

Atlanta, GA 30324

Fax: 888-576-7869

STATE COURT OF  
DEKALB COUNTY, GA.  
10/25/2021 5:29 PM  
E-FILED  
BY: Monica Gay

Control Number : SOP-21281600

# STATE OF GEORGIA

## Secretary of State

Corporations Division

313 West Tower

2 Martin Luther King, Jr. Dr.

Atlanta, Georgia 30334-1530

21A04842

### CERTIFICATE OF ACKNOWLEDGEMENT

I, Brad Raffensperger, Secretary of State of the State of Georgia, do hereby certify under the seal of my office that copies of legal documents regarding service of process upon:

**Georgi Boykov**

have been filed with the Secretary of State on 11/02/2021 pursuant to O.C.G.A. § 40-12-2 relating to the following matter:

Case: Blanca Mejia v. Georgi Boykov

Court: DeKalb County State Court

Civil Action No.: 21A04842

Witness my hand and official seal in the City of Atlanta and the State of Georgia on 11/08/2021.



*Brad Raffensperger*

Brad Raffensperger  
Secretary of State

**AFFIDAVIT OF SERVICE**

State of Georgia

County of De Kalb

State Court

Case Number: 21A04842

Plaintiff:  
**BLANCA MEJIA**

vs.

Defendant:  
**FOXTRAN INC.**

For:  
Jaraysi Law, LLC  
66 Lenox Pointe NE  
Atlanta, GA 30324

Received by Professional Legal Services & Investigations, LLC to be served on **Foxtran Inc. C/O Cody Giles, registered agent, 5704 Veterans Pkwy, Columbus, GA 31904.**

I, Jeremy Hattaway, being duly sworn, depose and say that on the **10th day of November, 2021 at 12:55 pm, I:**

served an **AUTHORIZED** entity by delivering a true copy of the **Summons and Plaintiff's Renewed Complaint for Damages & Jury Demand** to: **Cody Gillies as Registered Agent** at the address of: **5704 Veterans Pkwy, Columbus, GA 31904**, who stated they are authorized to accept service for **Foxtran Inc.**, and informed said person of the contents therein, in compliance with state statutes.

**Description** of Person Served: Age: 46, Sex: M, Race/Skin Color: White, Height: 6'4", Weight: 220, Hair: Bald, Glasses: N

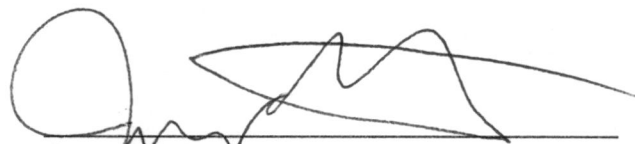
I certify that I am over the age of 18, have no interest in the above action, and that within the boundaries of the state where service was effected, I was authorized by law to make the service of the documents and informed said person of the contents within.

Subscribed and Sworn to before me on the 10th day of November, 2021 by the affiant who is personally known to me.

  
NOTARY PUBLIC

Dawn Austin Dekker  
NOTARY PUBLIC

Muscogee County, GEORGIA  
My Comm. Expires 03/25/2022

  
Jeremy Hattaway  
Deputy Sheriff

Professional Legal Services & Investigations,  
LLC  
P.O. Box 1078  
Columbus, GA 31902-1078  
(706) 610-0599

Our Job Serial Number: PFS-2021003023

